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Counsel for the Multi-State Governmental Entities Group

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

PURDUE PHARMA L.P., et al.,

Debtors.¹

Case No. 19-23649 (RDD)

(Jointly Administered)

NOTICE OF FILING OF DECLARATION OF KIRK LANE

PLEASE TAKE NOTICE of the following:

1. On October 22, 2021, the Multi-State Governmental Entities Group ("MSGE Group"), by and through its undersigned counsel, filed the Opposition of the Multi-State Governmental Entities Group to the Motions for Stay Pending Appeal (ECF No. 4016) ("MSGE Group's Stay Opposition").

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

- 2. Attached as Exhibit A to the MSGE Group's Opposition was the Declaration of Colin Jorgensen (ECF No. 4016-1), which included as Exhibit 1 to the declaration a report of the Office of the Arkansas Drug Director, entitled *Arkansas Naloxone Saves Program Report* ("State Drug Director Report").
- 3. On November 1, 2021, the States of Washington and Connecticut filed the Reply in Further Support of Motion of the States of Washington and Connecticut for a Stay Pending Appeal (ECF No. 4051) ("Washington & Connecticut Reply").
- 4. Paragraph 30, on page 15, of the Washington & Connecticut Reply raises an evidentiary objection to the State Drug Director Report.
- 5. Solely in response to the evidentiary objection raised in the Washington & Connecticut Reply to the State Drug Director Report, the MSGE Group hereby files a true and authentic copy of the Declaration of Kirk Lane, which is annexed hereto as **Exhibit A**. As disclosed in Exhibit A, Mr. Lane is the Arkansas Drug Director.
- 6. The accompanying declaration pertains to the matters set for hearing on Tuesday, November 9, 2021, at 10:00 a.m. EST.

[Signature of counsel appears on following page]

Dated: November 8, 2021 Respectfully submitted,

/s/ Kevin C. Maclay

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Counsel for the Multi-State Governmental Entities Group

CERTIFICATE OF SERVICE

I certify that on November 8, 2021, a copy of the foregoing was duly served upon counsel or parties of record by the Court's CM/ECF Notification system.

/s/ Kevin C. Maclay
Kevin C. Maclay